

JAY W. EISENHOFER (*admitted pro hac vice*)
MICHAEL J. BARRY (*admitted pro hac vice*)
GRANT & EISENHOFER P.A.
Chase Manhattan Centre
1201 N. Market Street
Wilmington, Delaware 19801
Telephone: (302) 622-7000
Facsimile: (302) 622-7100
E-Mail: jeisenhofer@gelaw.com
mbarry@gelaw.com

****E-Filed 7/29/2010****

Attorneys for Lead Plaintiff
THE NEW YORK CITY EMPLOYEES' RETIREMENT SYSTEM

GEORGE A. RILEY (S.B. #118304)
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, California 94111
Telephone: (415) 984-8700
Facsimile: (415) 984-8701
E-Mail: griley@omm.com

Attorneys for Defendant
APPLE INC.

(additional counsel listed on signature page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE APPLE INC. SECURITIES
LITIGATION

Case No. C06-05208-JF

CLASS ACTION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULING
MATTERS**

Judge: The Honorable Jeremy Fogel

1 WHEREAS, on August 24, 2006, plaintiffs Vogel and Mahoney filed a class action
2 complaint in this Court alleging that certain defendants violated the Securities Exchange Act of
3 1934 (the "Exchange Act"), including § 10(b) and Rule 10b-5 thereunder, and § 20(a)
4 ("*Vogel I*");

5 WHEREAS, on June 27, 2008, plaintiffs Vogel and Mahoney filed a new class action
6 complaint in this Court alleging that certain defendants violated the Exchange Act, including
7 § 10(b) and Rule 10b-5 thereunder, and § 20(a) ("*Vogel II*");

8 WHEREAS, on April 8, 2010, this Court entered an order consolidating *Vogel I* and
9 *Vogel II*, extending defendants' time to respond to the complaint to June 25, 2010, and setting a
10 briefing schedule in the event that defendants respond to the complaint by filing motions;

11 WHEREAS, on May 14, 2010, plaintiffs filed a [Corrected] First Amended Consolidated
12 Class Action Complaint ("Complaint");

13 WHEREAS, the parties have met and conferred and wish to extend defendants' time to
14 respond to the Complaint and modify the briefing schedule in the event that defendants respond to
15 the Complaint by filing motions;

16 NOW, THEREFORE, the undersigned parties hereby stipulate and agree, and respectfully
17 request that the Court enter an order as follows:

18 1. Defendants shall file their responses to the Complaint by September 3, 2010.

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2. In the event that defendants respond to the Complaint by filing motions, the briefing and hearing schedule for defendants' motions will be:

Plaintiffs' Oppositions Due:	October 8, 2010
Defendants' Replies Due:	October 29, 2010
Hearing:	To be set by the Court.

IT IS SO STIPULATED

Dated: July 27, 2010

GEORGE A. RILEY
O'MELVENY & MYERS LLP

By: /s/ George A. Riley
George A. Riley

Attorneys for Defendant
APPLE INC.

Dated: July 27, 2010

DOUGLAS R. YOUNG (S.B. #73248)
FARELLA BRAUN & MARTEL LLP
Russ Building
235 Montgomery Street, 17th floor
San Francisco, CA 94104
Telephone: (415) 954-4400
Facsimile: (415) 954-4480
E-Mail: dyoung@fbm.com

By: /s/ Douglas R. Young
Douglas R. Young

Attorneys for Defendants
STEVEN P. JOBS, WILLIAM V.
CAMPBELL, MILLARD S. DREXLER,
ARTHUR D. LEVINSON and JEROME B.
YORK

1 Dated: July 27, 2010

JEROME C. ROTH (S.B. #159483)
YOHANCE C. EDWARDS (S.B. #237244)
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, California 94105
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
E-Mail: Jerome.Roth@mto.com
Yohance.Edwards@mto.com

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6 By: /s/ Yohance C. Edwards
Yohance C. Edwards

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8 Attorneys for Defendants
9 FRED D. ANDERSON and NANCY R.
10 HEINEN

11 Dated: July 27, 2010

JAY W. EISENHOFER (*admitted pro hac vice*)
MICHAEL J. BARRY (*admitted pro hac vice*)
GRANT & EISENHOFER P.A.
Chase Manhattan Centre
1201 N. Market Street
Wilmington, Delaware 19801
Telephone: (302) 622-7000
Facsimile: (302) 622-7100
E-Mail: jeisenhofer@gelaw.com
mbarry@gelaw.com

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15
16 By: /s/ Michael J. Barry
Michael J. Barry

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19 MERRILL GLEN EMERICK (SB# 117248)
ANDERLINI & EMERICK LLP
411 Borel Avenue, Suite 501
San Mateo, California 94402
20 Telephone: (650) 242-4884
21 Facsimile: (650) 212-0081

22 Attorneys for Lead Plaintiff
23 THE NEW YORK CITY EMPLOYEES'
24 RETIREMENT SYSTEM
25
26
27
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1 I, George A. Riley, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding Scheduling Matters. In compliance with General
3 Order 45, X.B., I hereby attest that Douglas R. Young, Yohance C. Edwards and Michael J. Barry
4 have concurred in this filing.

5 By: /s/ George A. Riley
6 George A. Riley

7 **ORDER**

8 PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

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10 DATED: July 29, 2010

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12 _____
13 The Honorable Jeremy Fogel
14 United States District Judge

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